

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MICHAEL URBINO, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

**AMBIT ENERGY, L.P., AMBIT TEXAS,
LLC, and AMBIT NORTHEAST d/b/a
AMBIT ENERGY,**

Defendants.

Case No. 3:14-cv-05184-MAS-DEA

PLAINTIFF’S REQUEST FOR EXTENSION OF TIME TO AMEND COMPLAINT

Plaintiff Michael Urbino, respectfully requests the Court, to extend the time within which Plaintiff may amend the Complaint, in lieu of responding to the Motion to Dismiss, by 14 days to Dec 1, 2014.

Plaintiff has requested Defendants’ consent for an extension of time to file the Amended Complaint, however Defendants have denied Plaintiff’s request. There have been significant factual developments since Plaintiff filed suit in August 2014, The Amended Complaint will add additional plaintiffs as well as factual details to already pled allegations. Defendants will in no way be prejudiced if the changes are allowed at this point in the proceedings.

For the reasons identified above, Plaintiff requests that the Court grant Plaintiff’s request for extension to file an amended complaint.

Dated: November 17, 2014

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November 2014, a copy of the foregoing was served on the following via the Court ECF System:

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